

THE HONORABLE THOMAS S. ZILLY

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

Case No. 2:20-cv-00983-TSZ

DECLARATION OF GABRIEL REILLY-  
BATES IN SUPPORT OF PLAINTIFFS'  
RESPONSE IN SUPPORT OF CITY OF  
SEATTLE'S MOTION TO SEAL CERTAIN  
EXHIBITS

**Noted: October 14, 2022**

I, Gabriel Reilly-Bates, declare as follows:

1. I am an attorney with Morgan Lewis & Bockius LLP and represent Plaintiffs in the above-captioned action. I am over eighteen years of age and am competent to testify herein. I make the following statements based on my personal knowledge.

2. On Tuesday, September 27, 2022, in preparation of a meet and confer conference scheduled for Wednesday, September 28, 2022, to satisfy the parties' meet-and-confer obligations under FRCP 37 and LCR 5(g), counsel for the City indicated that there were several documents that

DECLARATION GABRIEL REILLY-BATES  
IN SUPPORT OF PLAINTIFFS' RESPONSE IN  
SUPPORT OF CITY OF SEATTLE'S MOTION TO  
SEAL CERTAIN EXHIBITS  
(Case No. 2:20-cv-00983-TSZ) - 1

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1 were marked confidential that the City wanted to file in support of its Motion for Spoliation  
2 Sanctions and its Motion for Summary Judgment.

3 3. Counsel for both parties discussed the process for reviewing documents to be filed  
4 under seal during the meet-and-confer conference on Tuesday, September 27, 2022, and on  
5 Wednesday, September 28, 2022, counsel for the City sent an updated list of 14 documents,  
6 including exhibits and deposition transcript excerpts, one of which was Ex. 10 to the City's Motion  
7 for Spoliation Sanctions (herein, "Ex. 10," which is further identified as POQUITOS-000009).

8 4. Counsel for Plaintiffs reviewed the City's list of 14 documents and determined that  
9 all but four of the exhibits could be publicly filed.

10 5. Following Plaintiffs' counsel's review of Ex. 10, Plaintiffs' counsel emailed counsel  
11 for the City to request that Ex. 10 be filed under seal.

12 I declare under the penalty of perjury under the laws of the United States of America and  
13 the State of Washington that the foregoing is true and correct.

14 DATED this 10<sup>th</sup> day of October, 2022 at Vashon Island, Washington.

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16 s/ Gabriel Reilly-Bates  
Gabriel Reilly-Bates

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27 DECLARATION GABRIEL REILLY-BATES  
IN SUPPORT OF PLAINTIFFS' RESPONSE IN  
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